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August 22, 2023

By ECF

The Honorable Jessica G.L. Clarke
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States Securities and Exchange Commission v. Qin, No. 20-cv-10849 (JGLC)

Dear Judge Clarke:

Under the Joint Stipulation, which the Court so-ordered on August 8, 2023 (*see* ECF No. 237), we write this joint letter on behalf of Robert A. Musiala, Jr., the Court-appointed receiver in the above-referenced litigation (“Receiver”) and non-party respondents, Nasir Adaya (“Adaya”) and Phuong Nguyen (“Nguyen,” and together with Adaya, “Respondents”).

In accordance with the Joint Stipulation, the parties exchanged discovery requests on August 11, 2023. The parties then met and conferred on August 15, 2023 to discuss these requests. At this point, the parties require additional time to discuss their requests, and we plan to submit another Joint Letter that memorializes our agreements (or disagreements) by Wednesday August 30, 2023.

We thank your Honor for the consideration of this letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marco Molina', with a long, sweeping horizontal line extending to the right.

Marco Molina,
for the Receiver

Two handwritten signatures in blue ink. The first signature is 'Aviva J.B. Gilbert' and the second is 'Gary M. Kaplan', written side-by-side.

Aviva J.B. Gilbert and Gary M. Kaplan,
for the Respondents